



Exhibit A

May 26, 2017

Savannah District, U.S. Army Corps of Engineers
ATTN: Mr. Nathan Dayan (PD)
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

RE: Comments on the Savannah Harbor Expansion Project (SHEP), Modification to Fish Passage Feature at the New Savannah Bluff Lock and Dam (NSBLD)

Dear Mr. Dayan:

The Augusta Metro Chamber of Commerce represents the interests of 1,200 businesses and organizations throughout the Central Savannah River Area (CSRA) and is very interested in the ongoing planning activity with regard to the New Savannah Bluff Lock and Dam by the United States Army Corps of Engineers. The NSBLD structure has become a part of the fabric of the Augusta/North Augusta Community over the past eighty-plus years. Alterations to, or replacement of the current structure could result in changes to the Savannah River which will have meaningful impacts on the greater community and our members for many, many years to come.

Thousands of jobs as well as millions of dollars and product depend on the level and use of water from the pool for process-water. Hundreds of millions of dollars in development have been created along the banks of the Savannah River because the pool of water created by the lock and dam creates the environment that makes them attractive and viable. This development includes hotels, conference and convention space, restaurants, a golf course, housing, museums and office space. Future plans include additional housing, retail, meeting space and professional space. The State of Georgia is building its Cyber Center on the banks of the river, North Augusta is developing a new baseball stadium directly next to the pool and conceptual plans to create an Augusta visitor destination center on the banks of the river are all developments currently underway.

For over 17 years, the Augusta Metro Chamber has been a leading voice in advocating for the rehabilitation of the NSBLD structure to ensure and safeguard our community's future dependency on the pool, especially as the structure has steadily deteriorated. As you are aware, the Water Resources Development Act of 2000 authorized the repair and conveyance of the NSBLD, and we remain committed in stating that this solution was viable and met the needs of our community. Had the project occurred as authorized, mitigation required by SHEP for the migration of endangered fish could have been accomplished with the construction of a Fish Passage/Bypass and without the need to legislatively fashion alternate projects as outlined in the Water Infrastructure Improvements for the Nation Act of 2016.

While we are encouraged that these project modifications legislate the security of the pool, it is still the opinion of the Augusta Metro Chamber that repair of the

lock and dam, and the construction of a fish bypass, is an optimal solution that meets our needs while reducing possible negative impacts on the community, and accomplishes the needs of the Savannah Harbor Expansion Project.

As stated, we are greatly encouraged that a project modification as outlined in WIIN 2016 requires the structure [to maintain the pool for navigation, water supply and recreational activities, as in existence on the date of enactment of this Act;] ((C) PROJECT MODIFICATIONS (1)(A)(i)). This is a significant legislative achievement for our community but we remain rightfully concerned that the projects as described in the law may not be able to achieve the desired result for both our community and SHEP and at the same time minimize the possible impacts of both not enough water or too much water. We understand final guidance is yet to be provided to the district on how it should proceed and how the feasibility of projects will be evaluated. Given the two project descriptions currently outlined in the law, the Augusta Metro Chamber of Commerce feels that one option offers more to our community than the other.

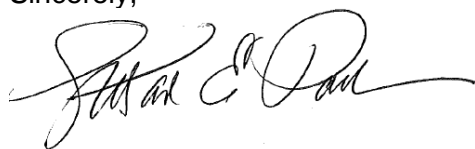
The Chamber believes that an option that provides for continued access from above the structure to the lower half of the Savannah River via an operational lock is preferable. We believe to permanently cut off the center of our region from the lower parts of the river and the Atlantic Ocean beyond is short-sighted. While there has not been significant usage of the existing lock in recent years that need could change in the future, and by permanently blocking the river entirely we may prevent a number of important and useful developments in the future. The existing lock's poor condition and lack of consistent operation has surely reduced demand in recent years; meanwhile our community is growing and we do not know what the future may hold. To forever seal Greater Augusta from the areas down river is not in our best interest.

The Chamber also believes that choosing an option that includes the lock has the further benefit of re-using the existing dam structure, which we view as preferable to constructing a new structure at a different location. The park at the existing lock and dam is popular with the public and a great asset to the county. We believe the value of this asset would be diminished should the dam structure move. In addition to the benefit to the park we feel that using the existing footprint for a new structure would reduce uncertainty and possible environmental impacts from construction at a new site.

For these multiple reasons, the Augusta Metro Chamber considers a project that repurposes the existing structure to include a lock more preferable over other project modifications described in WIIN 2016, if those options are the only ones currently under consideration. However, should further guidance allow for the full repair of the existing structure and construction of a bypass around the dam, we feel this option is best for the community.

The Augusta Metro Chamber of Commerce stands ready to continue to work in partnership with the USACoE to find the best way to move forward together. We believe that a solution that meets local needs as well as those of the Corps and that of the Savannah Harbor Expansion Project is an achievable goal that should be pursued.

Sincerely,



Susan E. Parr, GCCE, IOM
President/CEO

cc: Honorable Nathan Deal, Governor, State of Georgia
Honorable Johnny Isakson, United States Senate
Honorable David Perdue, United States Senate
Honorable Lindsey Graham, United States Senate
Honorable Tim Scott, United States Senate
Honorable Rick Allen, United States House of Representatives
Honorable Jody Hice, United States House of Representatives
Honorable Joe Wilson, United States House of Representatives
Honorable Jesse Stone, Georgia Senate
Honorable Harold Jones, Georgia Senate
Honorable Lee Anderson, Georgia Senate
Honorable Wayne Howard, Georgia House of Representatives
Honorable Gloria Frazier, Georgia House of Representatives
Honorable Sheila Nelson, Georgia House of Representative
Honorable Mark Newton, Georgia House of Representatives
Honorable Jodi Lott, Georgia House of Representatives
Honorable Barry Fleming, Georgia House of Representatives
Honorable Brian Prince, Georgia House of Representatives
Honorable Hardie Davis, Jr., Mayor, City of Augusta
Honorable Mary Davis, Commissioner, City of Augusta
Honorable Sammie Sias, Commissioner, City of Augusta
Honorable Ben Hasan, Commissioner, City of Augusta
Honorable Grady Smith, Commissioner, City of Augusta
Honorable Sean Frantom, Commissioner, City of Augusta
Honorable Dennis Williams, Commissioner, City of Augusta
Honorable Marion Williams, Commissioner, City of Augusta
Honorable Andrew Jefferson, Commissioner, City of Augusta
Honorable Wayne Guilfoyle, Commissioner, City of Augusta
Honorable Bill Fennoy, Commissioner, City of Augusta

Exhibit B

Misconceptions on Fish Passage Corrected

Posted on May 5, 2017 by US Army Corps of Engineers Savannah District

MISCONCEPTION: Funding to rehabilitate the NSBL&D was included in the budget for the Savannah Harbor Expansion Project (SHEP).

RESPONSE: Incorrect. No funds from SHEP were authorized for rehabilitation of the lock and dam. A small amount of SHEP funding was budgeted to modify two gates of the NSBL&D so that the original fish passage design would function properly – but that is all. The NSBL&D is presently in poor shape and would remain so. Rehabilitation of the structure would cost approximately \$30 million and Congress has not provided such funds for 25 years. Since the NSBL&D is in [caretaker status](#), there is very little chance funds would be appropriated to repair the structure. Like all other federal projects, it must compete for limited funding with projects across the nation, many of which produce more benefits to the nation and receive a higher funding priority. The large costs for repair make the NSBL&D a poor investment from the national perspective. Furthermore, the original fish passage depended on a fully functional NSBL&D in order to work as designed. Yet, the lock and dam are in such disrepair that our engineers say its collapse is inevitable. This is why the WIIN Act legislation is good news for the Cities of Augusta and North Augusta: it solves the problem of pending failure of the lock and dam and provides federal protection for the pool.

Exhibit C

Comparing the two Fish Passage alternatives

Posted on [March 18, 2019](#) by [US Army Corps of Engineers Savannah District](#)

Since we announced the recommended plan of Alternative 2-6d that would replace the New Savannah Bluff Lock and Dam with a fixed weir, many in the Augusta area have expressed interest in a different alternative, namely Alternative 1-1.

The Alt 1-1 design retains part of the current lock and dam with the fish passage moved partially out of the channel and onto the Georgia side of the river. We have received a number of inquiries on the cost of Alt 1-1, specifically compared to the recommended plan Alt 2-6d.

In order to provide more clarity to the public about the differences in cost, we requested a certified cost from our center of expertise and initiated consultation with NOAA Fisheries for Alt 1-1.

The feedback we received from the certified cost estimate confirmed Alt 1-1 costs more to operate and maintain than Alt 2-6d and, upon consultation with NOAA Fisheries the design is less likely to successfully pass fish.

The draft cost estimates for Alt 1-1 is more than twice the amount when compared with the recommended plan (Alt 2-6d) as shown in the below table below.

	Fed Share	Non Fed Share	Total
Alt 1-1: Repair the lock wall and construct a Georgia-side Fish Passage			
Investment	\$ 48,151,500	\$ 28,497,000	\$ 76,649,000
Major Rehab		\$ 93,711,000	\$ 93,711,000
O&M	\$ 13,307,000	\$ 196,652,000	\$ 209,959,000
Total	\$ 61,458,500	\$ 318,860,500	\$ 380,319,000
Alt 2-6d: Fixed crest weir with a flood plain bench			
Investment	\$ 48,151,500	\$ 43,997,500	\$ 92,149,000
O&M	\$ 13,307,000		\$ 13,307,000
Total	\$ 61,458,500	\$ 43,997,500	\$ 105,456,000

In accordance with our engineer regulations, the estimate is provided as a project first cost; that is, the full amount over time if one were to pay for everything up front in the current fiscal year.

The construction, real estate and major rehabilitation are shown in the dollar amounts expected if the entire option were paid for all at once in cash today. The operation and

maintenance equate to the value of the effort in today's dollar value if this project is completed over the next 100 years with an estimated wage growth, using the government labor estimate.

It helps to understand that the construction cost for the entire Savannah Harbor Expansion Project is shared with Georgia as the non-federal sponsor: 75 percent federal, 25 percent non-federal.

Based on the WIIN Act changes for the lock and dam, the federal cost share of the SHEP Fish Passage feature is limited to 75 percent of the original SHEP Fish Passage authorized in 2014, which is currently estimated at \$62,673,000.

Alt 1-1 was not selected as the federal plan. Therefore, any possibility to implement Alt 1-1 would require the non-federal sponsors, Georgia Ports Authority (GPA) and Georgia Department of Transportation (GDOT), to request a Locally Preferred Plan (LPP).

Under the cost-sharing requirements for a LPP, the non-federal sponsor is required to pay the difference in cost between the federal plan and the LPP alternative if the LPP is more costly than the federal plan.

Also, the locally preferred plan's ability to adequately pass endangered fish must be similar to the ability of the federal plan. Therefore, NOAA Fisheries consultation needs to provide assurance of equal benefits.

To date, our discussions with NOAA Fisheries indicate that the fish passing efficacy of Alt 1-1 is expected to be less than the ability of the 2-6d design. For this reason, we eliminated Alt 1-1 from further consideration.

The simulation exercise and the public comments are adding to our knowledge on the project as we continue to move forward with the mandate to begin construction by January 2021.

We are open to conversations with our non-federal sponsors and our water policy experts on other alternatives that would provide water surface elevations similar to Alt 1-1, but that include a full-river fish passage and weir.

Any alternative will require dedicated, cooperative and timely engagement with our non-federal sponsors to address all cost and real estate issues, which may occur with alternatives other than Alt 2-6d.

We remain committed to meeting the schedule as outlined in the NOAA-issued Biological Opinion, which requires start of construction by January 2021.

~ Russell Wicke, Corporate Communications Office